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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Socheat Chy,

Plaintiff,

v.

Sing Lim; Ray Lim; Tiffany Ngo;  
Ngo Asset Management, LLC;  
Tiffany Ngo in her capacity as  
trustee of the Tiffany Ngo Living  
Trust UTD; Naing Lam Yam; Jane  
Doe 1; Cindy Kanya Chan; Molica  
Ratha Keo; Nivodeth Khiev;  
Defendant Doe Gas Station 2;  
Defendant Doe Gas Station 3;  
Defendant Doe Laundromat 4; and  
DOES 5 through 10, inclusive,

Defendants.

Case No. 2:17-cv-04325

**JOINT STIPULATION TO EXTEND  
TIME TO RESPOND TO INITIAL  
COMPLAINT BY 30 DAYS AS TO  
DEFENDANTS MOLICA RATHA  
KEO AND NIVODETH KHIEV**

Complaint served: June 18, 2017  
Current response date: July 10, 2017  
New response date: August 9, 2017

1 Plaintiff Socheat Chy ("Socheat" or "Plaintiff") by and through her  
2 counsel, and Defendants Nivodeth Khiev and Molica Ratha Keo, in propia  
3 persona, hereby stipulate pursuant to Local Rule 8-3 to extend the time for  
4 Defendants to answer or otherwise respond to Plaintiff's Complaint to and  
5 including August 9, 2017.

6 WHEREAS, Plaintiff filed her Complaint on June 9, 2017 in the United  
7 States District Court, Central District of California.

8 WHEREAS, Plaintiff served Defendants with the Complaint on June 18,  
9 2017.

10 WHEREAS, Defendants' responsive pleading or motion to dismiss the  
11 Complaint is currently due on July 10, 2017.

12 WHEREAS, the parties agree and stipulate that Defendants' time to  
13 answer or otherwise respond to the complaint shall be extended to August 9,  
14 2017.

15  
16  
17 Dated: June 30, 2017

WILMER CUTLER PICKERING HALE AND  
DORR LLP

19  
20 By: /s/ Lorraine B. Echavarria  
Lorraine B. Echavarria (SBN: 191860)

21 Attorney for Plaintiff

22  
23 Dated: 7/3, 2017

24  
25 By: Molica Keo  
26 Defendant Molica Ratha Keo

1 Dated: 7/3, 2017

2  
3 By: Julie K. S.  
4 Defendant Nivodeth Khiev  
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**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Wilmer Cutler Pickering Hale and Dorr LLP, 350 South Grand Avenue, Suite 2100, Los Angeles, California 90071.

On July 6, 2017, I served the foregoing document(s) described as:

**JOINT STIPULATION TO EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT BY 30 DAYS AS TO DEFENDANTS MOLICA  
RATHA KEO AND NIVODETH KHIEV**

on each interested party through their attorney of record, or at their last known address, as stated below.



**(BY U.S. MAIL)** I caused such document(s) to be deposited with the U.S. Postal Service by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California, addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

Heidi S. Lewis  
SULLIVAN, KRIEGER, TRUONG,  
SPAGNOLA & KLAUSNER, LLP  
2 Park Plaza, Suite 900  
Irvine, CA 92614

*Attorney for Defendants Lam Sin Yam,  
Ray Lim, and Tiffany Ngo, individually  
and as a trustee of the Tiffany Ngo  
Living Trust UTD, and Ngo Asset  
Management, LLC*

**PROOF OF SERVICE**

(Continued)

Molica Ratha Keo  
Long Beach, CA

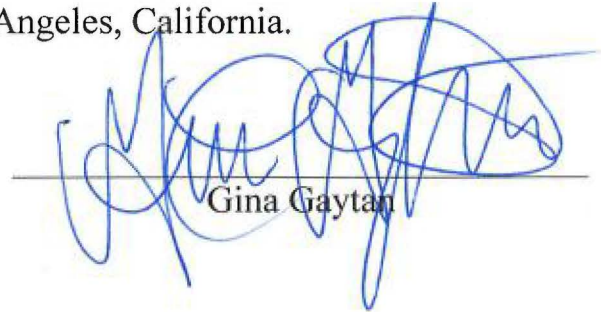
Nivodeth Khiev  
Long Beach, CA

Naing Lam Yam  
Long Beach, CA

Cindy Kanya Chan  
Long Beach, CA

I declare under penalty of perjury under the laws of the State of California  
that the foregoing is true and correct.

Executed on July 6, 2017 at Los Angeles, California.



Gina Gaytan